

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

PROGRESSIVE MOUNTAIN
INSURANCE COMPANY,

Petitioner,

v.

ROBERT RADCLIFF,
VBC EXPRESS LOGISTICS, LLC,
KEA TRANSPORTATION GROUP,
LLC, MARGARET MELZER, and
MICHELLE DENNEY, Individually
and as next friend of HUDSON
DENNEY, a minor child,

Respondents.

Civil Action File No.:
1:23-cv-02322-JPB

CONSENT MOTION TO DISMISS DENNEY RESPONDENTS

COME NOW, Petitioner Progressive Mountain Insurance Company and Respondents Michelle Denney, Individually and as next friend of Hudson Denney, a minor child (hereafter referred to as “the Parties”), and move this Court pursuant to Fed. R. Civ. P. 41(a) for an Order dismissing with prejudice Petitioner’s claims against Michelle Denny, Individually and as next friend of Hudson Denney, a minor child. As this Dismissal would be of less than all Parties, the Parties request the

Court to exercise its discretion and authorize the dismissal of all claims referenced above.

Respectfully submitted, this 2nd day of October, 2024.

LUEDER, LARKIN & HUNTER, LLC

/s/ Jennifer L. Pridgeon

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Georgia Bar No. 434428

MARGARET L. MANNS

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CONSENTED TO BY:

THE HUDGINS LAW FIRM, L.L.C.

/s/ David L. Hudgins

(by Jennifer Pridgeon w/e/p)

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MICHELLE DENNEY, Individually and as
Next Friend for HUDSON DENNEY, a Minor
Child*

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CERTIFICATION OF COMPLIANCE

The Undersigned Counsel hereby certifies that the foregoing has been prepared using Times New Roman 14-Point Font, as approved in LR 5.1C.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all parties to this matter by filing with the Court's CM/ECF system, which will automatically e-mail notification of same to the following parties of record as follows, and via United States Mail to the default Respondents at the last known address, as follows:

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Respectfully submitted this 2nd day of October, 2024.

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